

STEPHEN N. ROBERTS (SBN 062538)
Sroberts@nossaman.com
KATRINA J. LEE (SBN 191142)
Klee@nossaman.com
Nossaman, Guthner, Knox & Elliott, LLP
50 California Street, Thirty-Fourth Floor
San Francisco, California 94111-4707
Telephone: (415) 398-3600
Facsimile: (415) 398-2438

Attorneys for Defendant
Torres de Anguix, S.L.

J. SCOTT GERIEN, (SBN 184728)
Sgerien@dpf-law.com
MEGAN FERRIGAN HEALY (SBN 229177)
Mhealy@dpf-law.com
DICKENSON, PEATMAN & FOGARTY
809 Combs Street
Napa, CA 94559
Telephone: (707) 252-7122
Facsimile: (707) 255-6876

Attorneys for Plaintiff
Miguel Torres, S.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MIGUEL TORRES, S.A.,

Plaintiff,

vs.

TORRES DE ANGUIX, S.L.

Defendant.

Case No: C08-01288 WHA

**STIPULATION AND [PROPOSED] ORDER
RESCHEDULING CASE MANAGEMENT
CONFERENCE AND EXTENDING
DEADLINES**

Date Action Filed: March 5, 2008

1 Plaintiff Miguel Torres, S.A., and Defendant Torres de Anguix, S.L., by and through their
2 respective counsel, hereby request that the Court enter an Order approving of the Stipulation set forth
3 herein.

4 STIPULATION

5 Plaintiff Miguel Torres, S.A., and Defendant Torres de Anguix, S.L., by and through their
6 respective counsel, hereby stipulate and agree to the following:

7 1. Defendant Torres de Anguix, S.L. ("Defendant") has an extension up to and including
8 June 9, 2008 to file and serve its Answer to the Complaint.

9 2. Certain deadlines set in the Court's March 5, 2008 Order Setting Initial Case
10 Management Conference And ADR Deadlines shall be extended as follows:

11 a. The last day for the parties to meet and confer re: initial disclosures, early
12 settlement, ADR process selection, and discovery plan shall be extended from May 27, 2008 to June 30,
13 2008.

14 b. The last day for the parties to file a Joint ADR Certification with Stipulation to
15 ADR Process or Notice of Need for ADR Phone Conference shall be extended from May 27, 2008 to
16 June 30, 2008.

17 c. The last day for the parties to file Rule 26(f) Report, complete initial disclosures,
18 or state objection in Rule 26(f) Report shall be extended from June 9, 2008 to July 14, 2008.

19 3. The date of the Initial Case Management Conference, originally set as June 12, 2008 in
20 the March 17, 2008 Clerk's Notice Scheduling Initial Case Management Conference On Reassignment
21 ("Clerk's Notice"), shall be rescheduled to July 28, 2008, at 11 a.m., or to such date and time
22 thereafter that is available on the Court's calendar. The Joint Case Management Conference Statement
23 shall be filed no later than July 21, 2008.

24
25 \\\

26 \\\

27 \\\

28 \\\

1 Dated: May 27, 2008

STEPHEN N. ROBERTS
NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP

2
3 By: /S/
STEPHEN N. ROBERTS

4 Attorneys for Defendant
5 Torres de Anguiz, S.L.

6 Dated: May 27, 2008

J. SCOTT GERIEN
DICKENSON, PEATMAN & FOGARTY

8
9 By: 
J. SCOTT GERIEN

10 Attorneys for Plaintiff
11 Miguel Torres, S.L.

12
13
14 IT IS SO ORDERED.

15 Dated: _____, 2008

16
17 By: _____
18 HON. WILLIAM ALSUP
19 DISTRICT COURT JUDGE